

**From:** Brad Edwards <[REDACTED]>

**To:** "[REDACTED]. (USAFLS)" <[REDACTED]>

**Subject:** Re: Confidential Settlement Negotiations

**Date:** Tue, 17 May 2016 21:56:54 +0000

**Importance:** Normal

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I was waiting to hear back from Courtney and Paul and Jay Howell. You and I should talk this week. I am speaking most of tomorrow in Palm beach but can call on my way home.

Sent from my iPhone

> On May 13, 2016, at 8:15 AM, [REDACTED]. (USAFLS) <[REDACTED]> wrote:

>

> Good luck today. I will be on a flight until 11:00 or so.

>

> [REDACTED]

> Assistant US Attorney

> 500 S Australian Ave Ste 400

> West Palm Beach, FL 33401

> [REDACTED]

>

> On May 13, 2016, at 5:55 AM, Brad Edwards <[REDACTED]<mailto:[REDACTED]>> wrote:

>

> I will call you today. I have been in depositions on another abuse case and actually I will be in the deposition of a 7 year old today. I would hope the defense will not try to beat up this little girl so the deposition should be relatively short. I'll call you afterwards.

>

> Sent from my iPhone

>

> On May 13, 2016, at 12:32 AM, [REDACTED]. (USAFLS)

<[REDACTED]<mailto:[REDACTED]>> wrote:

>

> Hi Brad - I left you a message this afternoon but haven't heard back. I am going to be out of town starting tomorrow and I wanted to get this draft settlement agreement to you before I left. I have been working closely with [REDACTED] on this, so if you have proposed changes, please give him a call ([REDACTED]) or send him an email (he is cc'd above). I wanted to discuss it with you before the mediation, though, so if you could call me on my cell tomorrow, I would appreciate it.

>

> You will see that the agreement references a number of Appendices - the first is the list of victim names and I was hoping to use the list that you already have in your possession that you read to me over the phone so that there is no need to get a court order allowing us to provide a list. The second is the list of proposed changes to the AG Guidelines and Ombudsman procedures. The third is the list of proposed changes to the USAM. We also need a reference to the docket entry number and a copy of the document that you want unsealed so that we can review and determine that we are in agreement.

>

> Finally, we are waiting for final word from FBI about their obligations under paragraphs 3 & 4, so please treat this as a draft. Ed or I will let you know when we have received their concurrence.

>

> The bad news is that the Crime Victim higher-ups at DOJ were not able to find any source of funding for

counseling services. The FBI apparently also does not have a source of funds.

>

> Give me a call and we can discuss the agreement and logistics.

>

> Take care.

> [REDACTED]

>

>

> [REDACTED]

> Assistant U.S. Attorney

> Southern District of Florida

> 500 S. Australian Ave, Suite 400

> West Palm Beach, FL 33401

> [REDACTED] <mailto:[REDACTED]>

> [REDACTED]

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> <20160512 Jane Doe Settlement Agrmt - 501pm.pdf>